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## EMERY CELLI BRINCKERHOFF ABADY WARD & MAAZEL LLP

> Hon. Katharine H. Parker United States Magistrate Judge 500 Pearl Street New York, New York 10007

ATTORNEYS AT LAW 600 FIFTH AVENUE, 10TH FLOOR NEW YORK, NEW YORK 10020

July 18, 2022

application fronted. Lether H Parker USM J 1/20/22

Re: Clark, et al. v. City of New York, No. 18 Civ. 02334 (AT) (KHP)

Dear Judge Parker:

This firm represents the Plaintiffs. On behalf of both parties, we write to request that the status conference currently scheduled for July 21, 2022 at 10:00 a.m. be adjourned.

On June 27, 2022, the Court granted the parties' joint request for a 60-day extension of all discovery deadlines and adjourned the June 29, 2022 status conference to August 18, 2022. See Dkt. No. 224. Defendant will make its expert disclosure on July 29, 2022. See id. The parties continue to work collaboratively on discovery matters, including negotiating the appropriate scope of the 30(b)(6) deposition, scheduling expert depositions, and discussing the possible settlement of Turning Point's claims. Additionally, Defendant notified Plaintiff of this Court's recent order that the parties in this matter shall coordinate "where possible and sensible" with the plaintiff in the related case Bah v. City of New York, et al., 1:20-cv-00263 (AT) (KHP).

Given the foregoing, the parties have no agenda items for discussion at the July 21, 2022 conference, and respectfully request adjournment of that status conference.

Respectfully submitted,
/s/
Emma L. Freeman

cc. All Counsel of Record (by ECF)